

Continuous Improvement

By Sam Ciccone, Principal Reliability Consultant



The Assist Visit Program – Increasing Dialogue within the ERO The Journey to Security, Resiliency and Reliability

“Ask for help not because you’re weak, but because you want to remain strong” – Les Brown

Continuous improvement through dialogue with registered entities is an emerging theme. Dialogue is a “basic process for building common understanding”¹. One way to achieve successful dialogue is to ask for help in understanding Electric Reliability Organization (ERO) Reliability Standards through collaboration with RF. RF offers a voluntary program that can help to accomplish this goal. RF’s assist visit program is a valuable resource for entities who have questions about standards, effective dates, implementation plans, internal controls and various other subjects. In other situations, other RF business units, e.g., Compliance Monitoring and Enforcement, can recommend an assist visit for items challenging the registered entity.

We want our entities to do their best to understand Reliability Standards on their own. However, if you are not sure about your solution, or cannot find one quickly enough, we encourage using the assist visit program to confirm your understanding or find the answer.

The process

The process begins with a representative of the

registered entity filling out and submitting an assist visit request on RFirst.org on the Entity Engagement [Assist Visit Program website](#). We have one program leader for Operations and Planning (OPS) and another for Critical Infrastructure Protection (CIP). Once the request is received by the RF Entity Engagement department, the RF representative will coordinate available meeting times with the entity to discuss the questions. If necessary, RF will hold internal meetings among the subject matter experts (SMEs) to reach consensus before approaching the registered entity with guidance. Ideally, entities should provide as much detail, facts and insight into their question as possible when requesting the assist visit. Providing this information will expedite the process, especially when questions relate to NERC Reliability Standards implementation plans.

The program leader will seek the appropriate RF SMEs for the subject. These include SMEs from Compliance Monitoring (CoMo), Risk Analysis and Mitigation (RAM), Registration, Entity Engagement, among others. Most assist visits are conducted through conference calls; however, some may require in-person visits when the questions are

complex, or the situation demands onsite assistance.

The assist visit program classifies information into two categories: that which may be shared with the registered entities and that which cannot be shared or provided. The following are some examples:

Permitted

- Answering general questions and providing clarification on the standards as appropriate (guidance but not direction on acceptance or audit compliance determination).
- Sharing RF’s general compliance, monitoring, and enforcement expectations (what we are looking for, including facilitating discussions around opportunities for strengthening internal controls).
- Pointing the entity to relevant guidance endorsed by the ERO and to specific regional guidance documents.
- Matchmaking with other entities with the same challenges to collaborate on the issues (if both entities agree to collaborate).

¹ [The Process of Dialogue: Creating Effective Communication](#)

Continuous Improvement

Continued from Page 3

Not permitted

- Conducting assist visits during an audit or spot check.
- Exchanging formal written responses from RF summarizing the assist visit. Please note that entities are welcome and encouraged to take notes during the assist visit and RF can review the notes to ensure mutual understanding.
- Opining whether a registered entity's specific evidence, documentation, or practices satisfy its compliance obligations.
- Drafting or detailed editing of specific compliance documents for a registered entity.

Certain assist visit subjects may rise to the level of requiring NERC and RF management and oversight committees for guidance and final decision on guidance for the entity. From these more complicated questions, RF may develop lessons learned or best practices as a result that can be shared across RF or the ERO. Upon determining that an assist visit provides a meaningful and generic lesson(s) learned, we can follow up with additional outreach; this might involve presentations, RF workshops, working with the ERO on a reliability guideline or practice guide, or a future newsletter article.

OPS/CIP assist visit program leader and SME

Joseph (Joe) Jagodnik, RF Senior Reliability Consultant, leads the OPS portion of the assist visit program. Ron Ross, Principal Reliability Consultant, heads the CIP portion. Joe explains that the assist visit program is designed to engage registered entities, and that "The assist visit program helps entities expeditiously navigate through the Reliability Standards. No question is too big or small."

One SME involved in the assist visit program is Glenn Kaht, now a Principal Reliability Consultant within Entity Engagement. Glenn has significant experience in operations and has expertise in multiple Reliability Standard families (e.g., BAL, COM, EOP, IRO, TOP, VAR, etc.). Glenn and other RF SMEs will help the registered entity to navigate the Reliability Standards and requirements. In addition to Glenn, there are several other RF SMEs with various other expertise, including internal control program design, development and testing.

Success Stories

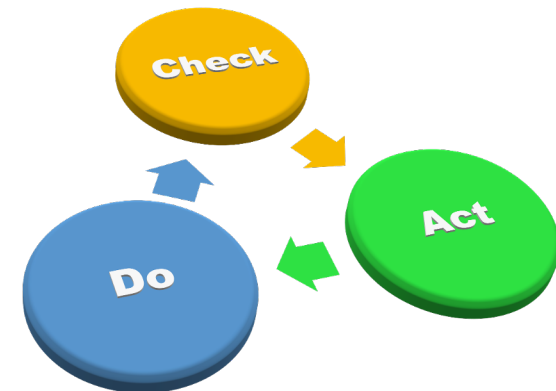
One recent success story resulted in NERC posting a revised Reliability Standards Audit Worksheet (an errata_change for TPL-007-4). This change to the Reliability Standard Audit Standards Worksheet (RSAW) was a result of an assist visit with RF. RF SMEs provided input and the questions escalated to the ERO Enterprise. The ERO concluded that it was necessary to revise the RSAW to clarify the responsibilities of the registered entity (and all entities) for a particular NERC requirement.

Another success story is an extended assist visit with an entity challenged by systemic CIP issues. This assistance lasted multiple years, consisting of periodic in-person and remote meetings. The tireless work by our Entity Engagement CIP experts helped this entity revamp its CIP program and increase the security, resiliency and reliability of the Bulk Power System.

Conclusion

The RF Assist Visit program is an important tool to increase collaboration and dialogue with our registered entities. This dialogue correlates to a Continuous Improvement concept called the Deming Wheel, or PDCA model (Plan, Do, Check, Act). The Plan (P) portion compares to a registered entity that is ensuring compliance to a requirement or the proper development of an internal control by seeking advice from RF SME before they "Do, Check and Act."

When questions arise involving the NERC standards, internal controls, reliability risks, or security risks, we advise our registered entities not to wait for help to arrive. We are always available to assist you in your journey to security, resiliency and reliability. "Engaging often and well with your regulators is the best path to complying with your regulatory [responsibilities]."²



² [Building Effective Relationships with Regulators](#)